510(k) SUMMARY K040974

1.0 **Submitted By:**

C.C. Allain, Ph.D. Chief Scientific Officer GenChem, Inc. 471 W. Lambert Road, Ste 107 Brea, CA 92821 Telephone: (714) 529-7125

FAX: (714) 529-3339

2.0 **Date of Preparation:** June 1, 2004

3.0 **Regulatory Information:**

- 3.1 Regulation section:
- 21 CFR § 862.1345, Glucose Oxidase Reagent for Beckman 3.2 Synchron CX3® System
- Clasification: Class II 3.3
- Product Code: CGA 3.4
- 3.5 Panel: Clinical Chemistry (75)

Device Description: 4.0

The Device is a solution containing sufficient Glucose Oxidase, surfactants and other ingredients necessary for optimum system operation on the Beckman CX3® Analyzer.

Substantial Equivalence Information: 5.0

- a. Predicate Device Name: Beckman Glucose Reagent for the CX3.
- **b.** Predicate K Number: K761060
- c. Comparison with Predicate: Both Reagents are similar in design, function and chemical principle as well as ingredient composition and concentration.

Performance Characteristics: All studies were performed on the Beckman 6.0 CX3 Synchron Analyzer.

Precision/Reproducibility: 6.1 Within-Day and Day-to-Day precision was determined according to NCCLS EP5-A. Results are summarized below:

Control sera and spiked urine pools were each assayed in triplicate, two times per day over 10 days on a SYNCHRON CX3® System. Estimates of within run and total imprecision were calculated as described in NCCLS publication EP3-T.

Precision of Glucose Recoveries in (mg/dL)

		Within Run					
Sample	n	mean	SD	%CV	SD	%CV	
Serum1	60	51	0.7	1.4	1.1	2.1	
Serum 2	60	220	1.3	0.6	2.3	1.1	
Serum 3	60	387	2.3	0.6	5.1	1.3	
CSF 1	60	57	0.7	1.2	1.4	2.4	
CSF 2	60	33	0.6	1.9	1.4	4.1	
Urine 1	59	24	0.7	2.9	1.4	5.8	
Urine 2	60	315	3.2	1.0	5.1	1.6	

Two additional control sera were spiked with glucose and assayed as described above using ORDAC sample dilution.

Precision of ORDAC Glucose Recoveries (mg/dL)

		Within	Run		Total			
Sample	n	mean	SD	%CV	SD	%CV		
Serum 1	60	557	8.1	1.5	10.0	1.8		
Serum 2	60	770	7.1	0.9	11.8	1.5		

6.2 Linearity/assay reportable range:

Linearity was performed according to NCCLS Guideline EP6-A. Commercially available linearity standards ranging from 0 to 800 mg/dL were analyzed in triplicate on the Beckman SYNCHRON CX3® and the results analyzed by the Least Squares method. The results gave a slope of 1.012 with an intercept of 0.1.97, a standard error of estimate of 6.83 and $r^2 = 1.000$. Samples exceeding these limits should be diluted with normal saline and reanalyzed. Multiply the result by the appropriate dilution factor.

Specimens	range	Conventional units	SI Units
All	Normal	5 to 450 mg/dL	0.3 to 25 mmol/L
All	ORDAC	450 to 900 mg/dL	25 to 50 mmol/L

6.3 SENSITIVITY:

The sensitivity of this method is 5.0 mg/dL and was documented through the repetitive assay of a diluted serum control. The observed sensitivity limit, calculated as three standard deviations of a 21 replicate within run

precision study, is 0.255 mg/dL and is below the claimed limit of 5.0 mg/dL.

6.4 Analytical Specificity:

Determined according to NCCLS EP7-A. Hemoglobin levels up to 500 mg/dL, Bilirubin levels up to 20 mg/dL, and Lipemia levels up to 1800 mg/dL were tested and did not show any adverse effect on a stock sample with a glucose level of 96 mg/dL. Stock solutions of the substance to be tested were prepared at 20x concentrations and 0.5 ml of this stock was placed in a 10 ml volumetric flask and made up to volume with the base pool. The control stock was prepared similarly but with water as the diluent. Heparin, Lithium Heparin, Ammonium Heparin, and EDTA, sodium fluoride and potassium oxalate are acceptable anticoagulants.

7.0 Patient Comparison

Serum, plasma and CSF specimens, and urine specimens spiked with glucose were collected from adult patients and assayed using GenChem and Beckman glucose reagents on a SYNCHRON CX3® System. Results were compared by least squares linear regression and the following statistics were obtained.

VALUE	SERUM	PLASMA	URINE	CSF
Intercept	-1.2	1.0	-2.1	1.0
Slope	1.011	1.000	1.012	0.973
R ² Value	0.999	0.999	0.999	0.999
N	79	80	81	45
Range (m	Range (mg/dL) 29 -341		1 – 359	3 – 186

8.0 Expected Values/ Reference Range:

The expected values for glucose are listed below. Use these ranges only as guides. Each laboratory should establish its own reference ranges.

Reference Ranges³ Conventional Units SI Units Specimens 3.89 - 5.83 mmol/L 70 - 105 mg/dL Serum/Plasma 1 - 15 mg/dL 0.1 - 0.8 mmol/L Urine (Random) < 0.5 q/day < 2.8 mmol/day Urine (Timed) 2.22 - 3.89 mmol/L 40 - 70 mg/dL **CSF**

DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration 2098 Gaither Road Rockville MD 20850

DEC 27 2004

C.C. Allain, Ph.D. Chief Scientific Officer GenChem, Inc. 471 W. Lambert Road, Suite 107 Brea, CA 92821

Re: k040974

Trade/Device Name: Glucose Oxidase Reagent

Regulation Number: 21 CFR 862.1345 Regulation Name: Glucose test system

Regulatory Class: Class II Product Code: CGA Dated: October 15, 2004 Received: October 15, 2004

Dear Dr. Allain:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in Title 21, Code of Federal Regulations (CFR), Parts 800 to 895. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Parts 801 and 809); and good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820).

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific information about the application of labeling requirements to your device, or questions on the promotion and advertising of your device, please contact the Office of In Vitro Diagnostic Device Evaluation and Safety at (301) 594-3084. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address http://www.fda.gov/cdrh/dsma/dsmamain.html.

Sincerely yours, Cornelia B. Rooks

Cornelia B. Rooks, MA

Acting Director

Division of Chemistry and Toxicology Office of In Vitro Diagnostic Device

Evaluation and Safety

Center for Devices and Radiological Health

Enclosure

INDICATIONS FOR USE

510(k) Number: K040974		
Device Name: Glucose Oxidase R	eagent	
Indications For Use:		
	brospinal fluid on	the Beckman SYNCHRON CX3® and certain endocrine disorders.
		•
Prescription Use X	AND/OR	Over-The-Counter Use
(Part 21 CFR 801 Subpart D)		(21 CFR 807 Subpart C)
(PLEASE DO NOT WRITE BELO	OW THIS LINE -	CONTINUE ON ANOTHER PAGE
IF NEEDED)		
Concurrence of CDRH, On	ffice of In Vitro Dia	agnostic Devices (OIVD)
Division Si	& Cut	<i>/</i>

Office of In Vitro Diagnostic Device Evaluation and Safety

51010 KO40974